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*Counsel for Defendant Beijing Matsushita
 Color CRT Co., Ltd.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION,

Case No. 3:07-cv-5944 SC, MDL No. 1917

This document relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
 No. 11-cv-05513;

*Target Corp. v. Chunghwa Picture Tubes, Ltd.,
 et al.*, No. 11-cv-05514;

Tech Data Corp., et al. v. Hitachi, Ltd., et al.,
 No. 13-cv-00157;

*ViewSonic Corp. v. Chunghwa Picture Tubes,
 Ltd., et al.*, No. 14-cv-02510.

**DECLARATION OF RICHARD S.
 SNYDER IN SUPPORT OF BEIJING
 MATSUSHITA COLOR CRT CO.,
 LTD.'S MOTION TO DISMISS OR, IN
 THE ALTERNATIVE, FOR
 SUMMARY JUDGMENT FOR LACK
 OF PERSONAL JURISDICTION**

Judge: Honorable Samuel Conti
 Court: Courtroom 1, 17th Floor
 Time: February 6, 2015, 10:00 am

1 I, Richard S. Snyder, hereby declare as follows:

2 1. I am Counsel at Freshfields Bruckhaus Deringer US LLP, counsel to Beijing
3 Matsushita Color CRT Company, Ltd. (**BMCC**) in the above-captioned litigation.

4 2. I am a member of the Bars of the Commonwealth of Virginia and the District of
5 Columbia and am admitted to practice before this Court *pro hac vice*. I have personal knowledge
6 of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

7 3. This declaration is submitted in support of the motion by BMCC for dismissal
8 pursuant to Federal Rule of Civil Procedure 12(b)(2) or, in the alternative, for summary judgment
9 pursuant to Federal Rule of Civil Procedure 56, in the direct purchaser actions, *In re Cathode Ray*
10 *Tube (CRT) Antitrust Litigation*, Master File No. 07-cv-05944, MDL No. 1917, on the ground
11 that the Court lacks sufficient evidence to exercise personal jurisdiction over BMCC.

12 4. The Kinoshita Declaration was first filed on September 30, 2013, in a related
13 action brought in San Francisco Superior Court.

14 5. Since the Kinoshita Declaration was filed, Mr. Kinoshita's successor as Deputy
15 Director, Marketing and Sales Dept. at BMCC, Mr. Masashi Muramatsu, was deposed by various
16 CRT claimants.

17 6. No other plaintiff sought to depose any other employee of BMCC.

18 7. Attached hereto as Exhibit A is a true and correct copy of the Deposition of
19 Masashi Muramatsu. **FILED UNDER SEAL.**

20 8. Attached hereto as Exhibit B is a true and correct copy of the Deposition of
21 Ayumu Kinoshita. **FILED UNDER SEAL.**

22 9. Attached hereto as Exhibit C is a true and correct copy of excerpts of the
23 Deposition of Chih Chun-Liu, which were initially introduced into this action as Exhibit K to the
24 Loh Declaration, Docket No. 2340. **FILED UNDER SEAL.**

25 10. Attached hereto as Exhibit D is a true and correct copy of a report of the
26 Philips/Matsushita 1st Global Meeting, which was initially introduced in this action as Exhibit O
27 to the Loh Declaration, Docket No. 2340. **FILED UNDER SEAL.**

1 11. Attached hereto as Exhibit E is a true and correct copy of Samsung SDI
2 Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories,
3 Nos. 4 and 5, Exhibit E to the Loh Declaration, Docket No. 2340. **FILED UNDER SEAL.**

4 12. Attached hereto as Exhibit F is a true and correct copy of excerpts from the
5 Deposition of Sheng-Jen Yang, which were initially introduced into this action as Exhibit F to the
6 Loh Declaration, Docket No. 2340. **FILED UNDER SEAL.**

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct, and that this declaration was signed this 7th day of November, 2014, in
9 Washington, D.C.

10 Freshfields Bruckhaus Deringer US LLP

11 By: 

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20 ***Color CRT Co., Ltd.***